

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

Telecom Business Solution, LLC, *et al.*,

Petitioners,

v.

Terra Towers Corp., *et al.*,

Respondents.

Civil Action No.: 1:22-cv-01761

Judge Lewis A. Kaplan

Magistrate Judge Robert W.
Lehrburger

DECLARATION OF JORGE HERNANDEZ

Pursuant to 28 U.S.C. § 1746, I, Jorge Hernandez, declare the following:

1. Terra Towers Corp. (“Terra”), TBS Management S.A. (“TBS”), and DT Holdings Inc. (“DT Holdings”) have requested that I make this declaration.

2. I am familiar with the Memorandum Opinion (the “Opinion”) issued by the District Court on April 22, 2025. This declaration is in fulfillment of Sections 5.2 and 6.2, which are on pages 47 and 48 of the Opinion.

3. I am not a lawyer. This declaration does not contain any opinion by me as to the legal effects of any issue in dispute.

4. I make this declaration without waiving any right that I may have, including the right to challenge any service purportedly made on me or anyone in my name.

5. By making this declaration, I am not submitting myself to the jurisdiction of this Court. I intend to move to quash the service purportedly made on me. I do not live in the United States. My permanent abode is in Guatemala.

6. I do not own Terra, TBS, or DT Holdings. I have never owned these entities.

7. As informed to the tribunal, I resigned as a director of Terra Towers Corp. and TBS Management S.A. in early 2023, over two years ago.

8. I have seen an email from Antonieta Granillo to the directors of Continental Towers Latam Holdings, Ltd. (the “Company”). The email states that the amparo proceeding before the Superior Court of Justice of El Salvador has been dismissed. Ms. Granillo has requested that the Company retrieve the dismissal.

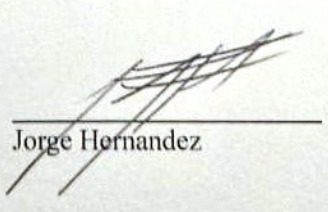
9. I do not control the actions of Ms. Granillo, who is an employee of Continental Towers El Salvador, Ltda. Ms. Granillo is not an employee of DT Holdings or its subsidiaries.

10. I am aware that Ms. Merino and Mr. Garzaro have submitted declarations regarding the dismissal of the BVI Actions. I am only generally aware of the arguments made on their behalf by their lawyers. My understanding is that they are doing their best to comply with the court’s order.

11. I do not control the actions of Ms. Merino or Mr. Garzaro. Both are employees of Telecom Business Solutions S.R.L., which is a subsidiary of the Company. They are not employees of DT Holdings or its subsidiaries.

12. I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Dated: May 21, 2025



Jorge Hernandez